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15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**

17 MICHAEL JOSEPH FOWLER, } Case No.: 2:24-cv-03550-DMC
18 Plaintiff, } STIPULATION AND ORDER FOR AN
19 vs. } EXTENSION OF TIME
20 COMMISSIONER OF SOCIAL SECURITY, }
21 Defendant. }

22 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
23 parties, through their respective counsel of record, that the time for Defendant to respond to
24 Plaintiff's Motion for Summary Judgment be extended eleven (11) days from May 1, 2025, up to
25 and including May 12, 2025. This is the Defendant's first extension request.

26 Defendant's counsel was recently assigned this case along with several other cases, and
27 now has four cases due on May 1, 2025. Defendant requests this extension in order to review the
record; evaluate the issues raised in Plaintiff's brief; determine whether options exist for
settlement; and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's
counsel will endeavor to complete these tasks as soon as possible. This request is made in good

1 faith and with no intention to unduly delay the proceedings, and counsel apologizes for any
2 inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 LAW OFFICES OF FRANCESCO BENAVIDES

7 Dated: April 11, 2025

/s/ *Francesco Benavides**

(*as authorized via e-mail)
FRANCESCO BENAVIDES
Attorney for Plaintiff

10 Dated: April 11, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

11 By: /s/ *Michelle A. Pavelek*
12 MICHELLE A. PAVELEK
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant

15 **ORDER**

16 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
17 extension, up to and including May 12, 2025, to respond to Plaintiff's Brief and Plaintiff's
18 optional reply brief will be extended to May 26, 2025.

20 Dated: April 11, 2025



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE